



Ex. 15

December 19, 2019

ID Code 00019411(MC)

VIA EMAIL AND REGULAR MAIL

acicsfallschurch@stratford.edu

Dr. Roblyn Lewter
Campus President
Stratford University
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Subject: Show-Cause Directive – Unapproved Location & Renewal of Accreditation

STRATFORD UNIVERSITY, FALLS CHURCH, VA	ID CODE 00019411(MC)
STRATFORD UNIVERSITY, WOODBRIDGE, VA	ID CODE 00019413(BC)
STRATFORD UNIVERSITY BALTIMORE CAMPUS, BALTIMORE, MD	ID CODE 00108252(BC)
STRATFORD UNIVERSITY – NEW DELHI, NOIDA, UTTAR PRADESH, INDIA	ID CODE 00029108(BC)

Dear Dr. Lewter:

At its December 2019 meeting, the Council considered the institution's response to the Continued Compliance Warning action on its renewal accreditation application as well as the details of adverse information received through its Complaints review process.

On September 19, 2019, ACICS began its investigation of a complaint received from a third party concerning the operations of the institution in Erbil, Iraq. According to the complaint, the institution was advertising via local media in the Kurdish language, recruiting for, and enrolling students at "The American Stratford University in Erbil," having obtained its charter from the Kurdistan Ministry of Higher Education and Scientific Research as an accredited branch campus of Stratford University. All marketing materials, including YouTube videos and Facebook postings, were in the Kurdish language, and the complainant provided three specific web links which confirmed this information. The institution was asked to submit a response, including an independent translation of the listings and a narrative explanation of its activities in Iraq.

In its first response, dated October 10, 2019, the institution explained that approval was secured on June 8, 2018 from the Ministry for the American Stratford University venture "subject to the constraints of US accreditation," and a preliminary Memorandum of Understanding (MOU) with a [REDACTED] and others was agreed upon to establish the campus in Erbil, Kurdistan. It was the institution's intent to submit an application for the branch campus in November 2019, prior to the Council's December meeting. However, the institution asserted that it does not have either a branch campus or learning site in Erbil. Rather, Stratford Language Institute (SLI) has a

branch campus where a foundation ESL course would ensure a pool of qualified candidates when the Stratford campus was operational. Students who completed the two-year SLI program would be accepted into Stratford University "...either in the US, on line, or Erbil, if approved by ACICS." The institution further asserted that all advertising in Kurdistan had been reviewed and any advertising that did not make clear that the initial launch was of SLI prior to the establishing of a fully-accredited branch location would be removed. The YouTube video was "unauthorized" and had been removed. A third-party contractor was used to audit all Google search results for Kurdistan to ensure compliance and that building signage reflects the Stratford Learning Institute.

However, this response did not fully address all the concerns: during its review, ACICS staff found additional web postings and a promotional video on [REDACTED] Facebook page that appeared to be recruiting for the new location. The complaint and the institution's response were then forwarded to the At-Risk Institutions Group (ARIG) for an assessment of investigative action. On October 25, 2019, the institution was asked to submit additional information, given the limitations in conducting a visit to Iraq. Requested were a narrative explanation on the nature of the relationship with [REDACTED], whose Facebook page included a Stratford University advertisement on September 20, 2019; an independent translation of that advertisement; a detailed explanation of the person(s) responsible for the management of approved advertisements and the procedures for managing published content; and evidence that all references to the Erbil campus of Stratford University have been removed, as ACICS approval has not been secured.

In its November 4, 2019 response, the institution admitted that it should have discussed its plans in Kurdistan with ACICS, as it had done with the Commission on English Language Accreditation (CEA). It stated that a branch application would be submitted before the end of November. The response also stated that all online postings in Kurdistan (Facebook, YouTube, and others) were reviewed, and they all reference only Stratford Language Institute in Kurdistan, making it clear that completion of the SLI program will qualify students for enrollment in Stratford University in the US or on line.

However, on November 19, 2019, [REDACTED], a parent, sent an email to the institution's ACICS address (acicsfallschurch@stratford.edu) and copied ACICS staff. In his email, [REDACTED] stated that his child is a "...student at Stratford branch campus in Erbil, Iraq." Apparently, he had visited the institution's web site recently and couldn't find that they had an official branch campus in Iraq. On November 20, 2019, the complainant also provided additional information that confirms that there is, in fact, an American Stratford University campus in Erbil, Iraq.

Evidence included pictures from the outside of the building with the "American Stratford University" signage (not that of Stratford Learning Institute as attested by the institution); a picture of a Certificate of Participation in recognition of a [REDACTED] "...valued participation (Barzan Genocide) Conference held on July 29th, 2019, at Stratford University, Erbil Campus"; a copy of advertising of programs offered at the University with a www.stratford.edu.krd web site referenced; and other pictures which clearly identify "Stratford

American University” as a functioning campus. Further, while the web site <https://stratford.edu.krd> was taken off line in response to our review, the following web sites still identify the campus:

1. The International Academic city, Erbil Facebook account:
<https://www.facebook.com/iacerbil/>
2. The Private University in Kurdistan listing: <https://www.mhe-krq.org/node/3347>
3. The US Consulate General in Erbil Twitter account:
<https://twitter.com/uscongenerbil/status/1170595188483469312?lang=bg>
4. Job advertisement through Naukri: <https://www.naukri.com/recruiter-job-listings-Lecturer-for-Accounts-Department-Education-Hyderabad-Secunderabad-Vijayawada-Andhra-Pradesh-Other-3-to-5-years-7277718>

Additionally, in reference to the Council’s ongoing consideration of the institution’s renewal of accreditation application, the institution first appeared before Council in April 2019 with a cumulative total of 107 findings, of which many were duplicated across multiple campuses. Of the 107, 74 areas were identified as being non-compliant, and the institution was placed on compliance warning. The institution reappeared before Council at the August 2019 meeting with a cumulative total of 74 findings, of which 53 were resolved to the Council’s satisfaction, and the institution was placed on continued compliance warning. The institution most recently appeared before Council at the December 2019 meeting with only 15 outstanding findings, as 3 branch campuses were closed. Of the 15, 10 areas were resolved to the Council’s satisfaction. As a result of its review, the Council requires additional information in the following areas of the *Accreditation Criteria*:

Falls Church Main Campus:

1. Emphasis is not placed on the effectiveness of the overall administration of the campus (Section 3-1-202(a)). The institution responded by submitting an alphabetized list of 145 currently employed faculty and staff but submitted only 88 signed ethical responsibility statements. In addition, there were 10 duplicate signed statements sent, one was illegible, and 10 signed statements were from employees that were not identified on the submitted list.
2. The campus does not maintain appropriate records to document that faculty and staff members clearly understand their duties and responsibilities (Section 3-1-202(b) and 3-1-303(a)). The institution responded by submitting an alphabetized list of 145 currently employed faculty and staff, along with a signed position description for 144 current employees.

3. The 2018 Campus Accountability Report (CAR) still cannot be verified (Section 3-1-203 and Appendix L). The institution submitted a student listing of 137 students who were previously listed as undeclared on the 2018 CAR, denoting they have either transferred to a degree program or withdrawn from the school. However, the institution did not provide an updated 2018 CAR to reflect the current status.

New Delhi Branch Campus:

1. The CEP does not meet Council standards in a number of areas (Section 3-1-111 and Appendix K). The institution submitted a revised CEP that demonstrated evidence of the graduate and employer survey instruments currently being used, along with four completed employer surveys. The institution completed an analysis of the employer surveys and from the analysis developed two action plans to enhance leadership skills and to improve and promote teamwork in new graduates. However, while the institution submitted numerical results of the graduate surveys, there was no analysis of the results, nor were any corrective action plans developed to improve the educational processes at the campus. In addition, the institution did provide CEP meeting minutes and sign-in sheets of the CEP members to verify that the CEP meeting was held and that the elements of the CEP were discussed.
2. The revised CEP does not appropriately incorporate assessment of faculty and student satisfaction with distance education (Section 3-1-111 and Appendices H and K). The institution submitted a revised CEP that demonstrated evidence of the student and faculty survey instruments currently being used, along with 14 completed student surveys. The institution completed an analysis of the student and faculty feedback but did not develop an action plan, simply stating “the goal is to keep improving the quality of online learning and Moodle interaction.” In addition, the institution did provide CEP meeting minutes where there was evidence of the online surveys being discussed but did not provide an explanation of how the data are being used to improve the educational programs.

Council Action

In light of the institution’s misrepresentation of its activities in Erbil, Iraq, its failure to secure appropriate approval prior to initiating any recruitment, advertising, and enrollment activities in the same, and the recent show-cause directive for data integrity issues at its New Delhi branch campus, the Council determined that the institution is out of compliance with the *Accreditation Criteria*. Therefore, the institution is directed to show-cause **in person** at the April 2020 meeting why its application for renewal of accreditation should not be denied and its current grant of accreditation withdrawn by suspension. The Council also acted to extend the institution’s grant of accreditation through May 31, 2020.

The institution is required to review and follow the Council hearing procedures as detailed in Section 2-3-500 of the *Accreditation Criteria* and the Schedule of Fees listing on the ACICS web site. The institution must provide the appropriate notification and fee **within ten (10) days of**

receipt of this notice: by January 7, 2020. Failure to do so may result in a withdrawal by revocation action in accordance with Section 2-3-401 of the *Accreditation Criteria*.

In response to the show-cause directive, the institution must submit the following information by **February 14, 2020** via the online Show-Cause Application, which will become available after payment of the fee.

1. Narrative explanation of the institution's ongoing campus activity in Erbil, Iraq which contradicts its assertion that it is only operating a branch campus of the Stratford Learning Institute.
2. Independently translated copies of all the materials referenced on the web sites above.
3. Evidence that there are no students enrolled at the branch campus. Documentation must include withdrawal forms and refund for any students enrolled at the date of this directive, along with formal notice that the Erbil location was not and is not accredited by ACICS.
4. Evidence that the institution has notified, within 10 business days of receipt of this electronic communication, its current and prospective students, along with the public of its show-cause status. Documentation must include copies of any communication to the students at American Stratford University in Erbil, Iraq and the web posting of the notice.

The campus-level response to the ongoing compliance issues related to the renewal of accreditation must be submitted to that campus's Renewal of Accreditation online application by **February 14, 2020**:

Falls Church Main Campus:

1. The institution must submit an updated, alphabetized list of all currently employed faculty and staff, along with the signed ethical responsibility statements for each, including signed ethical responsibility statements for any new hires.
2. The institution must provide a signed position description for [REDACTED], Dean of the School of Arts and Culinary Management.
3. Evidence that students reported as undeclared on the 2018 CAR have been updated to reflect their program of study. Documentation must include the names of any students who were previously undeclared and listed as "NPE," along with a copy of the revised and submitted 2018 CAR.

New Delhi Branch Campus:

1. A revised CEP that includes an appropriate evaluation of graduate satisfaction. The plan must include an explanation for the survey instruments used, along with a summary and analysis of the data collected and an explanation of how the data have been used to improve the educational processes at the campus. The campus must also describe any changes made to the educational processes that were directly related to the collection and analysis of these data. If applicable, the campus should provide updated CEP meeting minutes.
2. A revised CEP that includes a summary and analysis of the data related to student and faculty satisfaction with distance education activities. Data must include, but are not limited to, student and faculty surveys, faculty meeting minutes where distance education activities were discussed, and other evidence of faculty and student involvement with distance education activities. The campus must also describe any changes made to the educational processes that were directly related to the collection and analysis of these data.

Institutional Teach-Out Plan

Further, in compliance with Section 2-3-230 of the *Accreditation Criteria*, the institution must submit, as part of its response, an Institutional Teach-Out Plan for **all of its campuses** that ensures that students will receive an appropriate outcome, in the event of institutional closure. The plan must include the following:

1. A list of students, by campus, with the student name, program of study, expected graduation date, and institution at which the student will complete their program.
2. A custodian for all permanent academic records that includes contact information for this person or entity and the process by which students can obtain their records.
3. A description of the financial resources available to ensure that students who are expected to graduate from their current campus can complete their programs or receive refunds.

In addition to the electronic submission, one hard copy of the response must be sent to the Council's office by the date indicated above. The hard copy submission must include the institution's response to the Erbil, Iraq activity, the responses for each campus's ongoing renewal of accreditation review, and the institutional teach-out plan. Failure to provide all information requested by the Council may result in the withdrawal of your institution's current accreditation.

Pursuant to Title II, Chapter 3, Introduction of the Accreditation Criteria, the Council is obligated to take adverse action against any institution that fails to come into compliance within established time frames without good cause.

Please contact Ms. Perliter Walters-Gilliam at pwgilliam@acics.org for questions on the ARIG review of the adverse information or Mr. Andre McDuffie at amcduffie@acics.org for questions on the renewal of accreditation response.

Sincerely,



Michelle Edwards
President and CEO

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